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DEPARTMENT OF ENVIRONMENTAL QUALITY
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BUILDING PRODUCTS

July 9, 2007

Mr. Bill Rogers
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-0354

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DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

Re: Tier II Permit Renewal Application (Permit No. 001-00115)
Louisiana-Pacific Corporation – Meridian, Idaho

Dear Mr. Rogers:

The purpose of this letter is to request a renewal of the Tier II operating permit (Permit No. 001-00115) issued by the Idaho Department of Environmental Quality (DEQ) for Louisiana-Pacific's (LP's) composite decking facility in Meridian, Idaho (Meridian facility). This renewal letter includes a request for several administrative changes related to the naming of emission sources. Additionally, this letter includes a comparison of permitted emission sources to the point source emission limits stated in Appendix A of the existing Tier II permit (issued on July 12, 2002).

Request for Administrative Changes

LP proposes several updates to the emission source names used in the Meridian facility's correspondence with the Idaho DEQ. The current permitted names and proposed revisions are shown in Table 1. The Noltec storage silo baghouse, Donaldson baghouse, HDPE silo bin vent #1, and regrind baghouse are the only emission source name changes that directly affect the Tier II permit because they are explicitly identified in the Tier II permit and/or Technical Analysis text. All other proposed name changes identified in Table 1 are presented for informational purposes only. The proposed name changes will help maintain consistency with operating reports submitted to the Idaho DEQ and will help clarify source identification for LP Meridian facility personnel.

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TABLE 1. EMISSION SOURCE NAME REVISIONS

Source ID	In Permit ¹	Proposed Name
BH2	N/A ²	Noltec Dryer
C1A ³	Storage Silo Baghouse Stack	Noltec Storage Silo Baghouse
C3	BA Baghouse	Donaldson Baghouse
C7	HDPE Silo Bin Vent	HDPE Silo Bin Vent #1
E45A ⁴	Board Grinder Baghouse	Regrind Baghouse
C12	Finishing Line Baghouse #1	Line #10 Molder Baghouse
C13	Finishing Line Baghouse #2	Line #11 Molder Baghouse
C15	Dryer #1 Baghouse	Entek Dryer #1 Baghouse
C16	Dryer #2 Baghouse	Entek Dryer #2 Baghouse
C17	Wood Handling Baghouse #1	10 RA Baghouse
C18	Wood Handling Baghouse #2	8 RA Baghouse
C21	Finishing Line Baghouse #4	Line #12 Molder Baghouse
C22	Sifter Baghouse	Big Mac Baghouse
C23	Dry Wood Day Bin Vent #1	Dry Wood Day Bin Filter #1
C24	Dry Wood Day Bin Vent #2	Dry Wood Day Bin Filter #2

¹ Per the Tier II permit Technical Analysis issued by IDAHO DEQ on July 12, 2002, or the Permit to Construct (PTC) P-050039 approved on March 7, 2006.

² BH2 is not explicitly listed in either the Tier II permit or PTC P-050039.

³ The storage silo baghouse stack listed in the Tier II permit and the Technical Analysis was not assigned a source ID in either document. LP proposes the use of C1A as the source ID for the storage silo baghouse stack.

⁴ The existing Tier II permit identifies the board grinder baghouse source ID as BH1. LP proposes using E45A as the new source ID for the board grinder baghouse to match the naming convention used at the Meridian facility.

EMISSION UNIT PERMIT STATUS

A summary of the permit status of each emission source at the Meridian facility is provided in Table 2. In addition to the emission sources that are currently operating at the facility, sources that have been permitted but no longer operate are listed (i.e., the sources were never constructed or have been removed). This summary is provided for informational purposes to help clarify which permits regulate which sources.

TABLE 2. SOURCE PERMIT REVIEW

Source ID	Source Description	Applicable Permit	In Operation?
BH2	Noltec Dryer	Exempt ¹	Yes
C1A	Noltec Storage Silo Baghouse	Tier II	Yes
C1	Shavings Walking-Floor Truck Seal	Tier II	Yes
C2	Shavings Truck Dump Filter Receiver	Tier II	No ^{2,3}
C3	Donaldson Baghouse	Tier II	Yes
C4	Trim Ends Tipper Bin Dump	Tier II	No ^{4,5}
C5	Trim Ends Baghouse	Tier II	No ^{3,4}
C7	HDPE Silo Bin Vent #1	Tier II, PTC P-050039	Yes
C8	HDPE Silo Bin Vent	Tier II	No ^{4,5}
C9	HDPE Silo Bin Vent	Tier II	No ^{4,5}
C10	HDPE Transfer Filter Receiver	Tier II	No ^{3,4}
C11	Shavings Transfer Filter Receiver	Tier II	No ^{2,3}
E45A	Regrind Baghouse	Tier II	Yes
C12	Line #10 Molder Baghouse	PTC P-050039	Yes
C13	Line #11 Molder Baghouse	PTC P-050039	Yes
C14	Finishing Line Baghouse #3	PTC P-030058 ⁶	No ⁴
C15	Entek Dryer #1 Baghouse	PTC P-050039	Yes
C16	Entek Dryer #2 Baghouse	PTC P-050039	Yes
C17	10 RA Baghouse	PTC P-050039	Yes
C18	8 RA Baghouse	PTC P-050039	Yes
C19	HDPE Silo Bin Vent #4	PTC P-030058 ⁶	No ⁴
C20	Truck Dump	None ⁷	Yes
C21	Line #12 Molder Baghouse	PTC P-050039	Yes
C22	Big Mac Baghouse	PTC P-050039	Yes
C23	Dry Wood Day Bin Filter #1	PTC P-050039	Yes
C24	Dry Wood Day Bin Filter #2	PTC P-050039	Yes

¹ BH2 meets the criteria in IDAPA 58.01.01.221.01 for a category 1 exemption that is "below regulatory concern" (BRC). The maximum potential PM₁₀ emission rate for BH2 is 0.18 tons per year, which is well below the BRC threshold of 10% of the 15 ton per year significant emission rate (1.5 tons per year) for PM₁₀. The Noltec dryer has been included in the permit applications and dispersion modeling analyses associated with previous permitting efforts, including the 001-00115 Tier II permit and PTC P-050039 applications.

² The shavings truck dump filter receiver and shavings filter transfer receiver are no longer in service.

³ The shavings truck dump filter receiver, trim ends baghouse, HDPE transfer filter receiver, and shavings transfer filter receiver are listed in the Tier II Technical Analysis and are regulated under the emissions cap in Appendix A of the Tier II permit. No changes to the permit are required because these sources are included in the overall emissions cap for baghouses, receiver filters, and cartridge filters from the Conversion Project with associated vehicle traffic, but are not mentioned individually in the Tier II permit.

⁴ The trim ends tipper bin dump, trim ends baghouse, HDPE silo bin vents (C8, C9, and C19), HDPE transfer filter receiver, and finishing line baghouse #3 were permitted but never installed.

⁵ The trim ends tipper bin dump and HDPE silo bin vents (C8 and C9) are listed in the Tier II Technical Analysis but their emissions are not regulated under Appendix A of the Tier II permit; therefore, no changes to the Tier II permit are required.

⁶ The finishing line baghouse #3 and HDPE silo bin vent #4 (C14 and C19) are not included in the most recent PTC (P-050039). These units were included in the previous PTC (P-030058) issued on April 15, 2004, but were never installed.

⁷ The unit is a fugitive source. Fugitive sources are included in the Tier II permit Technical Analysis, but are not included in the Tier II permit or PTC P-050039.

TIER II PERMIT COMPLIANCE

Permit conditions 1.1, 1.3, 3.1, and the Appendix of the existing Tier II permit are codified into the Idaho SIP under 40 CFR 52.670(d). LP does not propose any changes, other than the administrative name changes as shown in Table 1, to any of the permit conditions codified into the SIP. Table 3 demonstrates that the potential emissions from the Meridian facility sources will remain within the emission limits in condition 1.1 and the Appendix (i.e., condition 1.1 references the Appendix for specific emission rate limits). LP does not propose any changes that will exceed the visible emission limits in condition 1.3. LP will continue to monitor the pressure drop across each baghouse, receiver, filter, and cartridge filter on a weekly basis, as specified in condition 3.1 of the existing Tier II permit.

TABLE 3. TIER II SOURCE EMISSION RATES

Source ID	Source Description	Current Point Source Potential Emission Rates ¹		Emission Limits in Existing Tier II Permit ²	
		(lb/hr)	(tpy)	(lb/hr)	(tpy)
C1A	Noltec Storage Silo Baghouse	0.014	0.06	0.014	0.06
C2	Shavings Truck Dump Filter Receiver	0	0	N/A ³	N/A ³
C3	Donaldson Baghouse	0.279	1.22	N/A ³	N/A ³
C4	Trim Ends Tipper Bin Dump	0	0	N/A ³	N/A ³
C5	Trim Ends Baghouse	0	0	N/A ³	N/A ³
C10	HDPE Transfer Filter Receiver	0	0	N/A ³	N/A ³
C11	Shavings Transfer Filter Receiver	0	0	N/A ³	N/A ³
Total Conversion Project Emissions ³		0.3	1.22	0.6	2.62
E45A	Regrind Baghouse	0.08	0.36	0.09	0.39
Total		0.375	1.64	0.704	3.07

¹ The current emission rates for sources that are not installed per Table 2 are entered as zero emissions.

² Per the Appendix of the existing Tier II permit.

³ C2, C3, C4, C5, C10, and C11 are baghouses, filter receivers, or cartridge filters per the Tier II Technical Analysis. These emission units are not limited directly, but are limited by an overall emissions cap on the baghouses, receiver filters, and cartridge filters from the Conversion Project with associated vehicle traffic.

The potential emission rate for the Noltec storage silo baghouse is identical to the emission rate specified in the Tier II permit (i.e., 0.014 lb/hr and 0.06 tpy). The Tier II permit specifies an emission limit for “baghouses, receiver filters, and cartridge filters from [the] Conversion Project with associated vehicle traffic.” The Conversion Project emission units include source IDs C2, C3, C4, C5, C10, and C11.¹ The current combined emission rates for all Conversion Project sources (i.e., 0.3 lb/hr and 1.22 tpy) are less than half of the emission limits in the existing Tier II permit (i.e., 0.6 lb/hr and 2.62 tpy). With the exception of the Donaldson baghouse (C3), all of the Conversion Project sources permitted under the existing Tier II permit are no longer

¹ The Tier II permit and Technical Analysis do not state explicitly which units are part of the “Conversion Project.” However, the sum of the annual emissions for source IDs C2, C3, C4, C5, C10, and C11 add up the emission limit for Conversion Project in the Tier II permit (2.62 tons/year). Additionally, these emission units are all labeled as “filters” or “baghouses” in the Technical Analysis. The Conversion Project source description in the Tier II permit exclusively includes “baghouses, receiver filters, and cartridge filters.”

operational. The current emission rate for the regrind baghouse is lower than the emission rates specified in the existing Tier II permit, as is the total current potential emission rate for all sources regulated by the existing Tier II permit.

The potential emission rates for C1A, C3, and E45a have been calculated using grain loading and equipment flowrates. Table 4 summarizes the emission rate calculations.

TABLE 4. EMISSION RATE CALCULATIONS

Source ID	Flowrate (scfm)	Moisture Content (%)	Grain Loading (gr/dscf)	Emission Rate (lb/hr)	Emission Rate (tpy)
C1A	675	0	0.0025	0.014	0.06
C3	13,000	0	0.0025	0.279	1.22
E45A	4,200	8	0.0025	0.083	0.36

SUMMARY

As noted above, this letter serves as LP's renewal application for the Tier II operating permit at the Meridian facility. LP proposes only the administrative name changes listed in Table 1 for the Tier II permit renewal. LP does not propose any other revisions to the existing Tier II permit. LP has demonstrated in Tables 3 and 4 that the potential emission rates for all sources regulated by the existing Tier II permit are less than or equal to the emission rates specified in the existing Tier II permit.

If you have any questions regarding this Tier II renewal request or require additional information, please contact me at (208) 888-6798 extension 108.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,

LOUISIANA-PACIFIC CORPORATION



Ken Ropski
Plant Manager (Meridian, Idaho)

cc: Ms. Geri Shoop – Louisiana-Pacific Corporation
Mr. Dirk Fontaine – Louisiana-Pacific Corporation
Mr. Aaron Day – Trinity Consultants
Mr. Michael Hedrick – Trinity Consultants
Ms. Deanna Duram – Trinity Consultants